



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

July 30, 2021

BY ECF AND ELECTRONIC MAIL

The Honorable Nicholas G. Garaufis
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. Christopher Chierchio, et. al.*, 20 Cr. 306 (NGG)

Dear Judge Garaufis:

The Government respectfully submits this letter to supplement its statements on the record at the July 28, 2021 status conference (the "conference") regarding the recusal of the United States Attorney's Office for the Eastern District of New York (the "USAO-EDNY") from this matter. As discussed at the conference, due to the familial relationship between Jacquelyn M. Kasulis, Acting United States Attorney for the Eastern District of New York, and Telemachus Kasulis, defense counsel to defendant Jason Kurland, the Department of Justice has authorized the recusal of the USAO-EDNY from involvement in the prosecution of this matter, and transferred responsibility for this prosecution to the United States Attorney's Office for the Southern District of New York (the "USAO-SDNY").

As part of that directive, the Department has permitted the USAO-SDNY to request authorization to staff personnel from the USAO-EDNY to work on this matter, under the supervision of the USAO-SDNY. To date, such authorization has been granted as to Assistant United States Attorney Lauren Howard Elbert of the USAO-EDNY. To the extent that any other personnel from USAO-EDNY are authorized to participate in the prosecution of this matter in the future, the Government will notify the Court. Assistant United States Attorney Olga I.

Zverovich of the USAO-SDNY, who has been assigned to work on this matter together with AUSA Elbert, has been appointed as a Special Attorney in order to appear on behalf of the Government in the Eastern District of New York.

Respectfully submitted,

AUDREY STRAUSS
United States Attorney

By: /s/
Olga I. Zverovich
Special Attorney Acting Under Authority
Conferred by 28 U.S.C. § 515

Lauren Howard Elbert
Assistant United States Attorney
Eastern District of New York

cc: Counsel of record (via ECF)